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August 30, 2022

BY ECF

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Fargesen, et al., 21 CR 602 (SDNY) (LAP)

Dear Judge Preska:


I am writing on behalf of defendant Vitaly Fargesen to respectfully request a modification of the defendant's conditions of release which would permit the temporary removal of his location monitoring ankle bracelet – from September 2, 2022 through September 8, 2022 – so that he may participate in a wedding in Rockleigh, New Jersey over Labor Day weekend without the device uncomfortably bulging from the side of his suit pants.

As the Court may recall, the location monitoring component of Mr. Fargesen's release on bail was added in January 2022 in response to his request to travel for employment outside the District of New Jersey and the Southern and Eastern Districts of New York – where he was previously permitted to travel without location monitoring. Should Your Honor approve this request, Mr. Fargesen would not engage in his employment or travel beyond his previously restricted areas until his location monitoring bracelet was reattached. Pretrial Services, by USPO Francesca Piperato, has no objection to this request. Additionally, my office reached out to AUSAs Andrew Thomas and Gina Castellano yesterday morning by email for the government's position and received automatic replies from both indicating that were presently out of the office.

Since the inception of this case, Mr. Fargesen has remained compliant with all Court orders and conditions of his release – and since Your Honor's January 2022 Order amending the conditions of his release, Mr. Fargesen has remained employed, continues to travel for work, and regularly communicates with Pretrial Services without issue. Indeed, Mr. Fargesen has

8/31/22

SO ORDERED


LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE